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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT,
DISTRICT OF UTAH, CENTRAL DIVISION**

LAYNE MORRIS, an individual; LEISL MORRIS in her own right, TABITHA SPEER, in her own right; TABITHA SPEER, as Executrix of the ESTATE OF CHRISTOPHER SPEER; and TABITHA SPEER on behalf of her minor children T.S. and T.S.,

Plaintiffs,

v.

OMAR KHADR, an individual,

Defendant.

**DECLARATION OF LAURA H. TANNER
IN SUPPORT OF
MOTION FOR DEFAULT**

Civil No.: 2:14-cv-00391-DBP

Magistrate Judge: Dustin B. Pead

Laura H. Tanner hereby declares and states as follows:

1. I am over the age of eighteen years and have personal knowledge of the matters set forth herein.
2. I am an attorney, licensed to practice in Utah.
3. I have been working at Winder & Counsel as an attorney since September of 2011.
4. I am one of the attorneys of record for the Plaintiffs in this action.

5. As of the date of this Declaration, my office has not been served with an Answer or other responsive pleading on behalf of Khadr in the above-captioned mater, and the time within which Khadr should have responded to the Complaint has expired.

6. Compliant with the Hague Convention, Khadr was served with a copy of the Summons and Complaint in this matter on June 19, 2014.

7. Attorneys considering entering an appearance for Khadr contacted me requesting an extension of time to respond to the Complaint first to August 1, 2014 and then to September 8, 2014.


8. As of the 11th of September, no appearance or answer has been filed on Khadr's behalf in this matter, and the time to do so has expired, despite the very generous extensions of time we granted.

9. Plaintiffs are entitled to Default Judgment in the amount of \$134,100,000 as set forth in the Complaint.

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I declare under perjury that the foregoing is true and correct.

DATED this 11th day of September, 2014.



Laura H. Tanner